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March 19, 2020

**VIA ECF AND EMAIL:**

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The Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
550 Pearl Street  
New York, New York 10007

Re: Arlene Delgado v. Donald J. Trump for President, Inc., et al.  
U.S. District Court, Southern District of New York  
Civil Action No. 19-cv-11764 (AT)

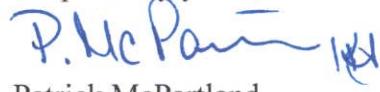
Dear Judge Torres:

We represent Donald J. Trump for President, Inc., Trump for America, Inc., Sean Spicer, and Reince Priebus (collectively the “Defendants”) in the above-captioned action, and write in response to plaintiff’s March 12, 2020, request for a pre-motion conference (or, alternatively, the issuance of a briefing schedule).

Specifically, we are writing to join in plaintiff’s request for a pre-motion conference, and to respectfully request that the Court not issue a briefing schedule until that conference is held. The reason for this request is that Defendants recently initiated the pre-motion procedures mandated by Section III(B) of Your Honor’s Individual Practices in connection with their own anticipated motion practice, which will also require a briefing schedule. We expect that these procedures under Section III(B) will be completed by the parties by April 1, 2020.

Accordingly, we respectfully request that Court schedule a telephonic pre-motion conference<sup>1</sup> on or after April 2, 2020, so that each of the parties' motions can be considered and scheduled accordingly at that time.

Respectfully yours,

  
Patrick McPartland

cc: Abraham Z. Melamed, Esq.  
(via ECF and email: [abe@dereksmithlaw.com](mailto:abe@dereksmithlaw.com))

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<sup>1</sup> A telephonic conference is requested in accordance with Rule 2(A) of Your Honor's Emergency Individual Rules and Practices in Light of COVID-19.